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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC.

CASE NO. 3:17-cv-00939-WHA

Plaintiff.

VS

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL**

Defendants

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion
 7 to File Under Seal Portions of Its Motion to Compel (the “Administrative Motion”). The
 8 Administrative Motion seeks an order sealing highlighted portions of Otto Trucking’s Motion to
 9 Compel (“Otto Trucking’s Motion”), of the Vu Declaration, and of Exhibits 8-9 and 16-17 thereto, as
 10 well as the entirety of Exhibits 3-7 and 12-15.

11 3. The portions of Otto Trucking’s Motion and the Vu Declaration marked in red boxes,
 12 the portions of Exhibits 3-14 and 17 highlighted in dark green, the portions of Exhibit 16 highlighted
 13 in red, and the entirety of Exhibit 15 contain or refer to confidential business information, which
 14 Waymo seeks to seal.

15 4. Uber’s Precis (portions marked in red boxes in version filed herewith), Exhibits 3-14
 16 and 17 (portions highlighted in dark green in versions filed herewith), Exhibit 15 (entire document),
 17 and Exhibit 16 (red highlighted portions) contain, reference, and/or describe Waymo’s highly
 18 confidential and sensitive business information. Such information includes details regarding
 19 Waymo’s security measures and protocols and detailed computer forensics regarding access to
 20 Waymo’s trade secrets. I understand that Waymo maintains that this information as confidential. The
 21 public disclosure of this information would cause significant competitive harm to Waymo, as its
 22 security measures and computer forensics methods would become known to competitors who could
 23 use such information to Waymo’s disadvantage.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Otto Trucking’s
 25 Motion and Exhibits 3-17 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 28, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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